

### REMARKS

Claims 17, 19-23, and 30-43 are in the application. Reconsideration and withdrawal of the rejections is requested in view of the following remarks.

Regarding the rejections at paragraphs 2-4 of the 06/30/2005 Office Action, enclosed is a Rule 1.131 Declaration antedating Kashkoush *et al.*, U.S. Patent No. 5,532,974, and Torek *et al.*, U.S. Patent No. 6,758,938. As the enclosed Declaration removes Kashkoush *et al.* and Torek *et al.* as prior art, the rejections of claims 17-20, 31 and 32 are overcome.

Turning to the rejections at paragraphs 4-5 of the 06/30/2005 Office Action, DeGendt *et al.*, U.S. Patent No. 6,551,409 B1, has no suggestion of rotating workpieces, flowing fresh processing liquid into the process chamber, while the workpieces are immersed in the process liquid, and no suggestion of drying the workpieces. While DeGendt *et al.* mentions a rinse step (column 6, lines 1-5; column 8, lines 7-12), there is no further suggestion as to how the rinse step is performed.

The entire disclosure in DeGendt *et al.* is directed to processing with ozone gas. In contrast, Konishi *et al.*, U.S. Patent No. 6,145,519, relates purely to cleaning with a liquid. Abstract, line 3; column 2, line 27, line 42, line 55; column 3, lines 18-34. Konishi *et al.* has no description of processing using a gas, as in DeGendt *et al.* Indeed, the only discussion in Konishi *et al.* of use of a gas is limited to use of nitrogen gas for purging (column 7, lines 21-27) in a step unrelated to actual chemical processing. Accordingly, as Konishi *et al.* relates purely to processing with a liquid, and DeGendt *et al.* relates purely to processing with ozone gas, there is no motivation to combine them.

Nevertheless, even if Konishi *et al.* is combined with DeGendt *et al.*, claims 34-37 and 40-43 are not rendered obvious. DeGendt *et al.* fails to suggest rotating the workpieces, drying the workpieces, or flowing fresh processing liquid into the chamber. Even if Konishi *et al.* discloses rotating the workpieces and drying, the flowing fresh processing liquid step of claims 34 and 43 is not suggested. Konishi *et al.* discloses only a spray rinse. Column 5, lines 10-13; column 6, lines 48-50. The spray rinse of Konishi *et al.* is entirely inconsistent with the claimed flowing fresh processing liquid step. Accordingly, claims 34 and 43 are not obvious over the combination of DeGendt *et al.* and Konishi *et al.*

In view of the foregoing, it is submitted that the claims are in condition for allowance. A Notice of Allowance is requested.

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